

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA

v.

ADRIAN PETTY

Criminal No. 21-188

[UNDER SEAL]

INDICTMENT MEMORANDUM

AND NOW comes the United States of America, by its attorneys, Stephen R. Kaufman, Acting United States Attorney for the Western District of Pennsylvania, and Rebecca L. Silinski, Assistant United States Attorney for said District, and submits this Indictment Memorandum to the Court:

I. THE INDICTMENT

A federal grand jury returned a one-count Indictment against the above-named defendant for an alleged violation of federal law:

| <u>COUNT</u> | <u>OFFENSE/DATE</u> | <u>TITLE/SECTION</u> |
|--------------|---|----------------------|
| One | Interstate Transportation of a Minor for Prostitution and sexual activity for which any person can be charged with a criminal offense On or about September 25, 2020 | 18 U.S.C. § 2423(a) |

FILED

APR 27 2021

II. ELEMENTS OF THE OFFENSE

As to Count One:

CLERK U.S. DISTRICT COURT
WEST. DIST. OF PENNSYLVANIA

In order for the crime of Interstate Transportation of a Minor for Prostitution and Sexual Activity for which any Person can be Charged with a Criminal Offense, in violation of 18 U.S.C. § 2423(a), to be established; the government must prove all of the following essential elements beyond a reasonable doubt:

1. That the defendant knowingly transported an individual in interstate or foreign commerce.
2. The individual was under eighteen (18) years of age when the transportation took place.
3. That, at the time of such transportation, the Defendant intended that the individual so transported engage in prostitution or any sexual activity for which any person can be charged with a criminal offense.

III. PENALTIES

As to Count One: Interstate Transportation of a Minor for Prostitution and Sexual Activity for which any Person can be Charged with a Criminal Offense (18 U.S.C. § 2423(a)):

1. A term of imprisonment of not less than ten (10) years to life. (18 U.S.C. § 2423(a)).
2. A fine not to exceed \$250,000.00. (18 U.S.C. § 3571(b)(3)).
3. A term of supervised release of not more than five (5) years. (18 U.S.C. § 3583(b)(1)).
4. Any or all of the above.

IV. MANDATORY SPECIAL ASSESSMENT

A mandatory special assessment of \$100.00 must be imposed at each count upon which the defendant is convicted, pursuant to 18 U.S.C. § 3013.

An additional mandatory special assessment of \$5,000 must be imposed as the offense was committed after May 29, 2015 and the offense is located within Chapter 117 of Title 18, United States Code. 18 U.S.C. § 3014(a)(4).

V. RESTITUTION

Restitution may be required in this case as to Count One, together with any authorized penalty, as part of the defendant's sentence pursuant to 18 U.S.C. §§ 3663, 3663A, and 3664.

VI. FORFEITURE

As set forth in the Indictment, forfeiture may be applicable in this case.

Respectfully submitted,

STEPHEN R. KAUFMAN
Acting United States Attorney

/s/ Rebecca L. Silinski
REBECCA L. SILINSKI
Assistant United States Attorney
PA ID No. 320774